UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Honorable James B. Clark, III

:

v. Mag. No. 19-3312

IL JEWELL MELBOURNE : CRIMINAL COMPLAINT

I, Angel Casanova, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives, and that this complaint is based on the following facts:

SEE ATTACHMENT B

Continued on the attached page and made a part hereof:

Angel Casanova, Special Agent

United States Department of Justice

Bureau of Alcohol, Tobacco, Firearms and Explosives

Sworn to before me and subscribed in my presence, June 28, 2019 in Newark, New Jersey

HONORABLE JAMES B. CLARK, III

United States Magistrate Judge

ATTACHMENT A

COUNT ONE

(Possession of a Firearm by a Convicted Felon)

On or about March 19, 2019, in Essex County, in the District of New Jersey and elsewhere, the defendant,

IL JEWELL MELBOURNE.

Knowing that he had previously been convicted in the Superior Court of New Jersey, Essex County, of a crime punishable by imprisonment for a term exceeding one year, did knowingly and intentionally possess in and affecting commerce a firearm, namely a SCCY CPX-1, 9 mm semi-automatic handgun, bearing serial number 715786, which was loaded with seven rounds of ammunition.

In violation of Title 18, United States Code, Sections 922(g)(1).

COUNT TWO

(Possession with Intent to Distribute Heroin)

On or about March 19, 2019, in Essex County, in the District of New Jersey and elsewhere, the defendant,

IL JEWELL MELBOURNE,

did knowingly and intentionally possess with the intent to distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT THREE

(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

On or about March 19, 2019, in Essex County, in the District of New Jersey and elsewhere, the defendant,

IL JEWELL MELBOURNE,

did knowingly possess a firearm, that is a loaded SCCY CPX-1, 9 mm semi-automatic handgun, bearing serial number 715786, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is the possession with intent to distribute heroin, as charged in Count Two of this Criminal Complaint.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

ATTACHMENT B

- I, Angel Casanova, am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and photographs of the evidence. Where statements of others are related herein, they are related in substance and part. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.
- 1. On or about March 19, 2019, detectives assigned to the Essex County Narcotics Task Force (collectively, the "detectives") were proactively patrolling in the Vailsburg section of Newark, which had recently seen an escalation in violent crimes, robberies, and open air narcotics transactions.
- 2. The detectives were conducting a surveillance operation that focused on two males congregating in the middle of Alexander Street. One of the males was later identified as Il Jewell Melbourne ("MELBOURNE"). The detectives observed the second male ("Individual-1") cross the street to meet with a third male ("Individual-2"). Individual-1 and Individual-2 engaged in a brief conversation, and then the detectives observed Individual-2 give Individual-1 suspected paper currency. Individual-1 appeared to retrieve a small object from his right ankle and hand the small object to Individual-2. Once the transaction was completed, the detectives observed Individual-1 walk back to MELBOURNE and hand MELBOURNE the suspected currency received from Individual-2.
- 3. Based on their observations, training, and experience, the detectives believed they had witnessed an illegal narcotics transaction between Individual-1, Individual-2, and MELBOURNE.
- 4. The detectives then observed MELBOURNE run across the street into a driveway while holding his waistband. MELBOURNE then walked back out of the driveway into the street towards a parked white vehicle (the "Target Vehicle") where Individual-1 was standing with two unknown females. The detectives then observed the two unknown females enter the driver and front passenger side doors of the Target Vehicle, and MELBOURNE and Individual-1 entered the rear doors of the Target Vehicle. The Target Vehicle drove off northbound on Alexander Street.
- 5. The detectives proceeded to conduct a vehicle stop of the Target Vehicle. While the detectives exited their vehicles, they observed MELBOURNE exit the left rear passenger side of the Target Vehicle and attempt to flee the

area. The detectives prevented MELBOURNE's escape and detained and arrested MELBOURNE.

- 6. Subsequent to MELBOURNE's arrest, the detectives searched MELBOURNE and found concealed in his right jacket pocket three bricks of suspected heroin and seven glassine envelopes of suspected heroin, which were labeled "Keep it Movin."
- 7. The detectives also recovered from a fanny pack that was strapped to MELBOURNE a 9 mm semi-automatic firearm, which was loaded with seven rounds of ammunition, and \$280 in U.S. currency.
- 8. The firearm was later determined to be a SCCY CPX-1, 9 mm semi-automatic handgun, bearing serial number 715786. The firearm was manufactured outside the state of New Jersey. Additionally, the firearm was reported stolen from a Federal Firearms Licensee in Oxford, Mississippi. Thus, the firearm moved in interstate commerce prior to being recovered in New Jersey on or about March 19, 2019.
- 9. Prior to March 19, 2019, MELBOURNE had at least one felony conviction, including a conviction in Superior Court, Essex County, on or about April 16, 2018, for burglary, in violation of N.J.S.A. 2C:18-2A(1), a crime punishable by imprisonment for a term exceeding one year.